

**Draft SI Report  
for Per- and Polyfluoroalkyl Substances (PFAS) at  
Former Fort Devens Army Installation, Devens, MA**

MassDEP Comment Date: 11/6/17

USACE Response Date: 1/12/18

Comment Number	MassDEP Comments	USACE Responses
1	Section 3.1.5: For future reference, the report should note that sample location AOC50-17-19 is at the end of a swale that received run-off from one of the airfield drainage system outfalls in the past (currently breached) and sample location AOC50-17-18 is located approximately 130 feet downstream of the end of the swale in a tributary to the Nashua River (Figures 25 and 26). Samples were collected from these locations to assess potential impacts to surface water and sediment downstream of airfield.	SI text has been updated to include the requested information.
2	Section 5.0 and Tables 13 through 18: Risk-based soil screening criteria should be developed and used to determine if PFAS in soil requires further action.	Army is planning to discuss risk based screening levels with the agencies as part of the RI phase of work.
3	Section 5.4: The report should identify the criteria used to determine that soils at SA 74 and SA 75 are not likely a significant source of PFAS contribution to groundwater.	Although no soil criteria for PFAS are currently established, PFAS concentrations in soil at SA 74 are low and fire training activities have ceased at SA 74. Although PFAS impacts to groundwater exceeding HAL concentrations were detected during the SI, significant future PFAS contributions to groundwater at SA 74 are unlikely. Based on interviews with local firefighting professionals, the warehouse fire at SA 75 occurred in the late 1980's or early 1990's. Thus, firefighting foam application at SA75 occurred approximately 25 to 30 years ago. Current PFAS groundwater concentration data collected during this SI indicate that neither PFOS nor PFOA are present at concentrations exceeding the HAL (Table 12 and Figure 18) in the vicinity of the former warehouse fire. Although no soil criteria for PFOS or PFOA are established, detected concentrations are low and are unlikely to result in groundwater concentrations exceeding the HAL if they have not already done so. The SI report text has been updated to include this information.
4	Section 6.1 and Tables 19 and 20: Risk-based surface water and sediment screening criteria should be developed and used to determine if PFAS in surface water and/or sediment require further action.	Army is planning to discuss risk based screening levels with the agencies as part of the RI phase of work.
5	Section 8.0: MassDEP agrees with the recommendation to undertake a remedial investigation.	Noted
6	Table 4: Water levels acquired from a particular site on different days may provide unreliable data for interpretation of flow directions. To support an assessment of the water levels collected during the investigation, please include a column listing the date on which each of the measurements was acquired.	Water Level collection dates have been added to Table 4. Note that many water levels were collected from temporary wells during the SI and collecting water levels on the same day from temporary wells was not feasible due to the number of wells being monitored. Water levels collected from permanent, existing wells were collected on the same day before groundwater sampling began.
7	Table 6: The first row of the header should be displayed.	The table has been updated to display the first row of the header.
8	Table 7: "Pending" (below sample AOC50-17-12 results) should be explained or deleted.	The word "Pending" has been deleted.
9	Table 13 should include results from sample AOC50-17-10.	Table 13 has been expanded to included results from sample AOC50-17-10.
10	Figure 5 does not present water levels measures at SA-30 and 31. If useful (refer to Comment 6), the report should include a map of contoured water levels measured at SA-30 and SA-31.	Figure 5 has been updated to GW contours at SA-30 and SA-31.
	End comments	End responses